## Remarks/Arguments:

Claims 1-23 are presently pending. All pending claims stand rejected. Applicants herein amend claims 1, 15, 16, and 19. Support for the claim amendments can be found at page 14, lines 16-22 and page 16, lines 5-9. No new matter is added. Applicants request reconsideration based on the above amendments and the following remarks.

Section 2 of the Office Action indicates that the specification is objected to for failing to include the relevant status, PTO serial numbers, and patent numbers where appropriate. In addition, the Office Action indicates that the specification is objected to for failing to identify the parent application by the serial number 09/524,046. Applicants herein amends the specification to include the relevant status, PTO serial numbers and/or patent numbers where appropriate. Accordingly, applicants request that the objection to the specification be withdrawn.

Section 4 of the Office Action recites that "[c]laim 15 is rejected under 35 U.S.C. § 112, second paragraph." Additionally, the Office Action indicates that claim 15 includes insufficient antecedent basis for the phrase "said executed I/O tasks." Applicants herein amend claim 15 to recite "said completed I/O tasks" rather than "said executed I/O tasks." Antecedent basis for "said completed I/O tasks" is found in claim 14, from which claim 15 depends. Accordingly, applicants contend that claim 15 is definite and request that the rejection of claim 15 under 35 U.S.C. § 112, second paragraph, be withdrawn.

Section 7 of the Office Action recites that "[c]laims 1-6, 16-19, and 22-23 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Heimsoth et al. (USPN 5,764,915) (hereinafter Heimsoth) in view of Broder et al. (USPN 5,991,808) (hereinafter Broder). Claim 1 includes at least one feature that is neither disclosed nor suggested by Heimsoth and Broder.

Claim 1 is directed to a computer system for optimizing processing of an annotation request from a client and includes the following features:

> a request processor configured to receive said annotation request from said client and to break said annotation request down into a plurality of constituent tasks;
>
> a task queue for storing the plurality of constituent tasks that need to be performed for said annotation request;

a thread-controlling means for maintaining a plurality of threads; and

an assigning means for assigning said plurality of threads to said
plurality of constituent tasks in said task queue.

This means that a computer system for optimizing processing of an annotation request includes a request processor, a task queue, a thread controlling means, and an assigning means. The request processor is configured to receive annotation requests from a client and to break the annotation request down into a plurality of constituent tasks that are stored in a task queue. An assigning means assigns threads from a plurality of threads to the constituent tasks in the tasks queue. These features are found in the specification as originally filed at page 13, line 32 through page 16, line 9.

In claim 1, a request processor is configured to receive an annotation request and to break down the annotation requests into a plurality of constituent tasks. An assigning means then assigns a plurality of threads to the plurality of constituent tasks. Thus, in accordance with claim 1, threads are assigned to constituent tasks of an annotation request as broken down by the request processor.

Broder and Heimsoth are devoid of any disclosure, teaching, or suggestion of a request processor configured to break down an annotation request into constituent tasks. Further, Broder is devoid of any disclosure, teaching, or suggestion of multiple threads. Heimsoth discloses a thread pool, however, the threads in Heimsoth are assigned to service requests received from members of a client port pool. See column 22, lines 16-18 of Heimsoth. Thus, Heimsoth discloses assigning threads based on client requests. This unlike claim 1 in which threads are assigned to constituent tasks of an annotation request broken down by a request processor. Accordingly, Broder and Heimsoth fail to disclose, teach, or suggest a request processor configured to break down an annotation request into constituent tasks and to assign threads to the constituent tasks. Therefore, Broder and Heimsoth fail to disclose teach or suggest each and every limitation of claim 1.

It is because the requests are broken down into constituent tasks that the tasks can be channeled into one or more task queues for processing. For example, a task located at the beginning of the task queue which is not ready for execution due to other constraints may be bypassed until it is ready to run. Alternatively, a task that is not ready to be executed may be

reprioritized to wait for its turn for execution.  See page 14, lines 24-32 of the application as originally filed.

Accordingly, for the reasons set forth above, applicants contend that claim 1 is allowable over Broder and Heimsoth and respectfully request that the rejection of claim 1 be withdrawn.

Claims 16 and 19, while not identical to claim 1, include features similar to claim 1. Accordingly, applicants contend that claims 16 and 19 are also allowable over Broder and Heimsoth for the reasons set forth above that claim 1 is allowable and respectfully request that the rejections of claim 16 and 19 be withdrawn.

Claims 2-6, 17, 22, and 23 include all of the features of the independent claim from which they ultimately depend.  Thus, claims 2-6, 17, 22, and 23 are also allowable over the cited references for at least the reasons set forth above with respect to independent claims 1, 16, and 19.  Accordingly, applicants contend that claims 2-6, 17, 22, and 23 are likewise allowable and, therefore, respectfully request that the rejection of claims 2-6, 17, 22, and 23 be withdrawn.

Section 18 of the Office Action recites that "[c]laim 7 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over Hemsoth in view of Broder in view of Bahr" (USPN 5,109,512) (hereinafter Bahr).  Claim 7 depends directly from claim 1 and includes all of the features and limitations of claim 1.  Bahr fails to make up for the deficiencies of the Heimsoth and Broder.  Accordingly, applicants contend that claim 7 is allowable and, therefore, respectfully request that the rejection of claim 7 be withdrawn.

Section 21 of the Office Action recites that "[c]laims 8 and 9 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Heimsoth in view of Broder in view of Bauer (USPN 5,877,759)" (hereinafter Bauer).  Claims 8 and 9 each depend from claim 1 and include all the features and limitations of claim 1.  Bauer fails to make up for the deficiencies of Heimsoth and Broder.  Accordingly, applicants contend that claims 8 and 9 are allowable and, therefore, respectfully request that the rejection of claims 8 and 9 be withdrawn.

Section 24 of the Office Action recites that "[c]laims 10 and 11 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Heimsoth in view of Broder in view of van Hoff (USPN 5,822,539)" (hereinafter van Hoff).  Claims 10 and 11 each depend from claim 1 and include all the features and limitations of claim 1.  van Hoff fails to make up for the deficiencies

of Heimsoth and Broder. Accordingly, applicants contend that claims 10 and 11 are allowable and, therefore, respectfully request that the rejections of claims 10 and 11 be withdrawn.

Section 28 of the Office Action recites that "[c]laims 12-15, 20, and 21 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Heimsoth in view of Broder in view of Spix et al. (USPN 5,179,702) (hereinafter Spix). Claims 12-15 each depend directly from claim 1 and include all of the features and limitations of claim 1 and claims 20 and 21 each depend from claim 19 and include all of the features and limitations of claim 19. The features that were found to be lacking in Heimsoth and Broder with reference to claims 1 and 19 are not found in Spix. Thus, Spix fails to make up for the deficiencies of Heimsoth and Broder. Accordingly, applicants contend that claims 12-15, 20, and 21 are allowable and, therefore, respectfully request that the rejection of claims 12-15, 20, and 21 be withdrawn.
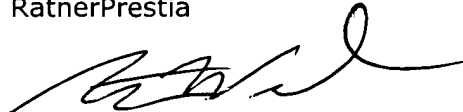
In view of the amendments and remarks set forth above, applicants respectfully submit that claims 1-23 are in condition for allowance and early notification to that effect is earnestly solicited.

Respectfully submitted,

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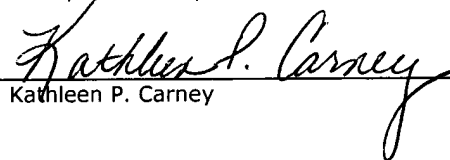Attorneys for Applicants

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The Director is hereby authorized to charge or credit Deposit Account No. **18-0350** for any additional fees, or any underpayment or credit for overpayment in connection herewith.

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Kathleen P. Carney

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